

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of  
Telecommunications and Energy on its own motion  
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon  
New England Inc., d/b/a Verizon Massachusetts'  
provision of Special Access Services.

D.T.E. 01-34

**WORLDCOM'S AND AT&T'S THIRD SET OF INFORMATION  
REQUESTS TO VERIZON**

WorldCom, Inc., and AT&T Communications of New England, Inc. submit to Verizon  
Massachusetts the following information requests. Please provide responses to these requests as  
they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

## INFORMATION REQUESTS

1. Refer to each of the following errors in the Verizon data identified at the December 13, 2001 Technical Session:
  - a. Absence of interstate retail data in multiple supplemental replies (page 49 of Technical Session transcript);
  - b. Column for January 2001 in data provided in the supplemental reply to WCOM/ATT-VZ 1-4 does not add up to “Grand Total” (pages 81-82 of transcript);
  - c. Row for DS0 circuits completed on time for January 2001 in data provided in the supplemental reply to WCOM/ATT-VZ 1-4 does not add up to “Total” (pages 82-83 of transcript);
  - d. For a particular month, circuits completed on time (WCOM/ATT-VZ 1-4) plus Verizon and customer misses (WCOM/ATT-VZ 1-5) do not total circuits completed (WCOM/ATT-VZ 1-3) (page 83 of transcript);
  - e. Missing data point in supplemental reply to WCOM/ATT-VZ 1-4 for June, interstate, non-affiliate DS0 (page 84 of transcript);
  - f. Availability by month of wholesale data provided in the supplemental reply to WCOM/ATT-VZ 1-6 (page 85 of transcript); and
  - g. DS0 circuits completed for October 2001 provided in the supplemental reply to WCOM/ATT-VZ 1-18 do not equal the DS0 circuits completed for October 2001 provided in the supplemental reply to WCOM/ATT-VZ 1-3 (pages 86-87 of transcript).

For each error listed above, please (i) identify whether Verizon corrected the error in its errata responses filed December 21, 2001 and (ii) identify each and every data point Verizon changed in the errata responses.

2. Please identify any errors in the data Verizon attempted to correct other than those errors identified at the December 13, 2001 Technical Session and listed above, and for each such error, identify each and every data point changed in the errata responses as a result of such error.
3. Refer to the Supplemental Reply WCOM/ATT-VZ 1-4 where the interstate, affiliate DS0 circuits listed for January – October 2001 are systematically higher than the interstate, affiliate DS0 circuits listed for January – November 2001 in the Errata to Supplemental Reply WCOM/ATT-VZ 1-4.
  - a. Please identify separately (i) the database or other information source from which the circuits in the Supplemental Reply were selected and (ii) the database or other information source from which the circuits in the Errata to Supplemental Reply

were selected;

- b. Please identify separately (i) the criteria used by Verizon for counting the circuits reported in the Supplemental Reply and (ii) the criteria used by Verizon for counting the circuits reported in the Errata to Supplemental Reply;
  - c. Please explain whether and to what extent differences in the databases and selection criteria account for differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply. If no difference in the databases and selection criteria exists, or if such differences do not account for all of the differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply, please explain and provide all documentation supporting the differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply.
4. For each data point (i) changed by Verizon in response to errors identified in the December 13, 2001 Technical Session and listed in WCOM/ATT-VZ 3-1 above and (ii) changed by Verizon for other reasons and provided in response to WCOM/ATT-VZ 3-2 above:
- a. Please identify separately (i) the database or other information source from which the circuits in the Supplemental Reply were selected and (ii) the database or other information source from which the circuits in the Errata to Supplemental Reply were selected;
  - b. Please identify separately (i) the criteria used by Verizon for counting the circuits reported in the Supplemental Reply and (ii) the criteria used by Verizon for counting the circuits reported in the Errata to Supplemental Reply;
  - c. Please explain whether and to what extent differences in the databases and selection criteria account for differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply. If no difference in the databases and selection criteria exists, or if such differences do not account for all of the differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply, please explain and provide all documentation supporting the differences in the circuit counts between the Supplemental Reply and the Errata to Supplemental Reply.

Respectfully submitted,

**WORLDCOM, INC.**

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December 28, 2001